



GEORGIA PUBLIC BROADCASTING

EEO AUDIT MATERIALS

WABW-TV

2007



Federal Communications Commission
Washington, D.C. 20554

Rec'd -
GPB

FEB 12 2007

EXECUTIVE DIRECTOR'S
OFFICE

February 8, 2007

WABW-TV PELHAM, GA 23917
GEORGIA PUBLIC TELECOM. COMMISSION
260 14TH STREET, NW
ATLANTA, GA 30318-5360

Dear Licensee:

1. In accordance with the provisions of 47 C.F.R. § 73.2080(f)(4) of the Commission's Equal Employment Opportunity (EEO) rules, the station employment unit (the "Unit") that includes your above-referenced station (the "Station") has been randomly selected for an audit of its EEO program. (A copy of Section 73.2080 is enclosed for your reference.)

2. If the Unit is not required to have an EEO recruitment program due to the size of its full-time workforce (employing fewer than five full-time employees, defined as employees regularly assigned to work 30 hours a week or more), you must still respond to this audit letter. However, in your response, you must provide only a list of the Unit's full-time employees, noted by job title and the number of hours each is regularly assigned to work per week, and a response to question 3(e) below.

3. **Audit Data Requested.** If the Unit employs five or more full-time employees, provide the following information in your response to this letter, including an explanation for any information that you are unable to provide:

(a) The employment unit's two most recent EEO public file reports, described in 47 C.F.R. § 73.2080(c)(6). For any stations in the Unit that have websites, state the web addresses. If the Unit's most recent public file report is not included or linked to on any of these websites, in violation of 47 C.F.R. § 73.2080(c)(6), provide an explanation for why it is not there.

(b) For each full-time position filled during the period covered by the above EEO public file reports, or since your acquisition of the Station, if after that period, dated copies of all advertisements, bulletins, letters, faxes, e-mails, or other communications announcing the position, as described in § 73.2080(c)(5)(iii). Include copies of job announcements sent to any organizations (identified separately from other sources) that have notified the Unit that they want to be notified of Unit job openings, as described in § 73.2080(c)(1)(ii).

(c) In accordance with § 73.2080(c)(5)(v), the total number of interviewees for each vacancy and the referral source for each interviewee for all full-time Unit vacancies filled during the period covered by the above-noted EEO public file reports.

(d) Documentation demonstrating performance of recruitment initiatives described under § 73.2080(c)(2) during the periods covered by the above-noted EEO public file reports, such as participation at job fairs, mentoring programs, etc. Specify the Unit personnel involved in the

recruitment initiatives. Also, provide the total number of full-time employees of the Unit and whether the population of the market of the Unit is 250,000 or more. Based upon these two factors, as explained in 47 C.F.R. §§ 73.2080(c)(2) and (e)(3), determine and state whether the Unit is required to perform two or four initiatives within a two-year period.

(e) Disclose any pending or resolved complaints filed during the Station's current license term before any body having competent jurisdiction under federal, state, territorial or local law, alleging unlawful discrimination in the employment practices of the Unit on the basis of race, color, religion, national origin, or sex. For each such complaint, provide: (1) a brief description of the allegations and issues; (2) the complainant and other persons involved; (3) the date of its filing; (4) the court or agency before which it is pending or was resolved; (5) the file or case number; and (6) the disposition and date thereof or current status. All complaints must be reported, regardless of their status or disposition.

(f) In accordance with § 73.2080(b), from March 10, 2003 (or from the first day of the Station's current license term if after that date) until the date of this letter, describe the responsibilities of each level of Unit management to ensure enforcement of Unit EEO policies and describe how the Unit has informed employees and job applicants of its EEO policies and program.

(g) In accordance with § 73.2080(c)(3), from March 10, 2003 (or from the first day of the Station's current license term if after that date) until the date of this letter, describe the Unit's efforts to analyze its EEO recruitment program to ensure that it is effective and address any problems found as a result of such analysis.

(h) In accordance with § 73.2080(c)(4), from March 10, 2003 (or from the first day of your current license term if after that date) until the date of this letter, describe the Unit's efforts to analyze periodically measures taken to examine pay, benefits, seniority practices, promotions, and selection techniques and tests to ensure that they provide equal opportunity and do not have a discriminatory effect, and if the Unit has one or more union agreements, describe how the Unit cooperates with each union to ensure EEO policies are followed for the Unit's union-member employees and job applicants.

(i) If you are a religious broadcaster and any of your full-time employees are subject to a religious qualification as described in § 73.2080(a) of our rules, please indicate this in your response to this letter and provide data as applicable to your EEO program. For example, for full-time hires subject to a religious qualification, the Licensee should provide: a record of the hire listed by job title and date filled, the recruitment sources used for the opening, and the source of the hiree. No other records would be required for those hires. If five or more full-time positions are not subject to a religious qualification, the Licensee must keep all records for such hires and complete the initiatives required under § 73.2080(c)(2), and this should be provided. Otherwise, a religious broadcaster would not be required to perform these initiatives.

-NA-
4. Time Brokerage.

(a) **Brokered station(s).** If the Unit employs fewer than five full-time employees and any station included in it is subject to a time brokerage agreement, in addition to responding to this letter to provide us a list of the Unit's full-time employees listed by job title (and the number of hours each employee is assigned to work) and answer to question 3(e) above, you must immediately forward a copy of this letter to the broker under each such agreement.

(b) **Brokers.** If you are the broker of any Unit station referenced above, you are required to supply the Commission with the information requested herein regarding *your* full-time employees who work at each such brokered station. If this letter is addressed to you requesting data about a station licensed to you, and you also broker a station in another employment unit, you must send us the information requested herein for each of your stations and your full-time employees at each brokered employment unit, if the recruitment data for any such brokered unit is included with that for your own station referenced above. *See* 47 C.F.R. § 73.2080(f)(3). If your employees at your own station(s), combined with your employees at the station(s) you are brokering, total fewer than five full-time employees, however, you need not provide such information. Instead, you must respond to this letter by the deadline described below by providing us with a list of your station unit's full-time employees (listed by job title and number of hours regularly assigned to work per week) and the same type of list for the full-time employees you employ at the brokered station(s), and a response to question 3(e).

03/09/07-
5. **Procedures.** All responses must be postmarked within 30 calendar days of the date of this letter. The response must be in the form of a statement signed by an officer, partner or other principal of the Station licensee or, in the case of a noncommercial educational station, by an officer, member or other principal of the licensee. Send the response to EEO Staff, Policy Division, Media Bureau, Federal Communications Commission, 445 12th Street, S.W., Washington, DC 20554. To knowingly and willfully make any false statement or conceal any material fact in response to this audit is punishable by fine or imprisonment (*see* 18 U.S.C. § 1001; *see also* 47 C.F.R. § 1.17), and/or revocation of any station license or construction permit [47 U.S. Code § 312(a)(1)], and/or forfeiture (47 U.S.C. § 503). Failure to respond to this audit letter by the deadline is also punishable by sanctions against the licensee, in accordance with 47 C.F.R. § 73.2080(g). Should you have any questions regarding this matter, please contact the EEO Staff at (202) 418-1450.

6. In accordance with 47 C.F.R. § 73.3526(e)(10) (for commercial stations) and 47 C.F.R. § 73.3527(e)(11) (for noncommercial educational stations), copies of which are also enclosed, you are required to place a copy of this letter and your response in the public inspection file of each affected station. Consequently, your response should not include personal information about individuals, such as social security numbers, home addresses, or other personally identifiable information. We do not require that employment units retain such information in their records, or that such information be provided in response to this letter.

7. If our EEO random audits sent in 2006 included the Station, please call the EEO staff at (202) 418-1450 before responding to this letter.

Thank you for your cooperation.

Sincerely,



Lewis C. Pulley
Assistant Chief, Policy Division
Media Bureau

Enclosure

2007 EEO AUDIT
GEORGIA PUBLIC TELECOMMUNICATIONS COMMISSION (GPTC)

1. In accordance with the provisions of 47 C.F.R. § 73.2080(f) (4) of the Commission's Equal Employment Opportunity (EEO) rules, the station employment unit (the "Unit") that includes your above-referenced station (the "Station") has been randomly selected for an audit of its EEO program. (A copy of Section 73.2080 is enclosed for your reference.)

Stations selected: WUNV (FM), Albany, Georgia
 WABW (TV), Pelham, Georgia
 WJSP (FM), Warm Springs, Georgia

2. If your unit is not required to have an EEO recruitment program due to its size (employing fewer than five full-time employees, defined as employees regularly assigned to work 30 hours a week or more), you must still respond to this audit. However, you need to provide us only a list of your unit's full-time employees listed by their job titles and showing the number of hours they are regularly assigned to work per week, and a response to question 3 (e) below.

GPTC is required to have an EEO recruitment program. GPTC EEO Public Inspection File Reports are "combined" reports (with the exception of WMUM (FM) and WMUM -TV in Macon/Cochran) which has more than five full-time employees) and include recruitment information for the stations selected for this audit. Each of the selected stations has fewer than five full-time employees.

3. Audit Data Requested. If the Unit employs five or more full-time employees, provide the following information in your response to this letter, including an explanation for any information you are unable to provide:

The audit report is combined to include all stations selected.

- (a) The employment unit's two most recent EEO public file reports, described in 47 C.F.R. § 73.2080(c) (6). For any stations in the Unit that have websites, state the web addresses. If the Unit's most recent public file report is not included or linked to on any of these websites, in violation of 47 C.F.R. § 73.2080(c)(6), provide an explanation for why it is not there.

GPTC's website address is www.gpb.org.

EEO Public Inspection Files Reports for 2005 and 2006 are provided as Attachments 1 and 2.

- (b) For each full-time position filled during the period covered by the above EEO public file reports, or since your acquisition of the station(s) if after that period, dated copies of all advertisements, bulletins, letters, faxes, e-mails, or other communications announcing the position, as described in § 73.2080(c)(5)(iii). Include copies of job announcements sent to any organizations (identified separately from other sources) that have notified the Unit that they want to be notified of Unit job openings, as described in § 73.2080(c)(1)(ii).

This information is provided as Attachment 3.

- (c) In accordance with § 73.2080(c) (5) (v), provide the total number of interviewees for each vacancy and the referral source for each interviewee for all full-time vacancies filled during the period covered by the above EEO public file reports.

This information is provided as Attachment 4.

- (d) Documentation demonstrating performance of recruitment initiatives described under § 73.2080(c)(2) during the periods covered by the above-noted EEO public file reports, such as participation at job fairs, mentoring programs, etc. Specify the Unit personnel involved in the recruitment initiatives. Also, provide the total number of full-time employees of the Unit and whether the population of the market of the Unit is 250,000 or more. Based upon these two factors, as explained in 47 C.F.R. §§ 73.2080(c)(2) and (e)(3), determine and state whether the Unit is required to perform two or four initiatives in a two-year period.

This information is provided as Attachment 5.

- (e) Disclose any pending or resolved complaints filed during the Station's current license term before any body having competent jurisdiction under federal, state, territorial or local law, alleging unlawful discrimination in the employment practices of the Unit on the basis of race, color, religion, national origin, or sex. For each such complaint, provide: (1) a brief description of the allegations and issues; (2) the complainant and other persons involved; (3) the date of its filing; (4) the court or agency before which it is pending or was resolved; (5) the file or case number; and (6) the disposition and date thereof or current status of the matter. All complaints must be reported, regardless of their status or disposition.

The current license term for GPTC's television stations is April 1, 2005, through April 1, 2013, and the current license term for GPTC's radio stations is April 1, 2004, through April 1, 2012. Although the complaints included in this audit were filed prior to April 2004 and 2005, the disposition and status of these complaints fall within GPTC's current license period.

Additional information is provided as Attachment 6.

- (f) In accordance with § 73.2080(b), from March 10, 2003 (or from the first day of your current license term if after that date) until the date of this letter, describe the responsibilities of each level of management to ensure enforcement of unit EEO policies and describe how the Unit has informed employees and job applicants of its EEO policies and program.

GPTC conducts an orientation program for new hires that describes the Equal Employment Opportunity guidelines for recruitment, evaluation, selection, promotion, compensation, training, transfer, demotion, reduction-in-force and termination. This orientation program is a Power Point presentation. Slide numbers 25 and 42 of the Program are provided along with copies of GPTC's policies related to Equal Employment Opportunities / Affirmative Action.

This information is provided as Attachment 7.

- (g) In accordance with § 73.2080(c)(3), from March 10, 2003 (or from the first day of the Station's current license term if after date) until the date of this letter, describe the Unit's efforts to analyze its EEO recruitment program to ensure that it is effective and address any problems found as a result of such analysis.

GPTC makes every effort to monitor its recruitment efforts to ensure it reaches the diverse demographics represented in its broadcast region. Each job applicant is asked to complete a demographic profile that identifies his/her age, race, and sex. This data is used to analyze the effectiveness of efforts made to reach minority communities and organizations.

Each year GPTC prepares a workforce planning document which describes the demographic make-up of the organization. Areas where ethnic or gender minority groups are underrepresented are highlighted and reported in the gap analysis. When this data is reported, a plan to close the gap or increase the presence of underrepresented groups is developed and tracked.

- (h) In accordance with § 73.2080(c)(4), from March 10, 2003 (or from the first day of your current license term if after that date) until the date of this letter, describe the Unit's efforts to analyze periodically measures taken to examine pay, benefits, seniority practices, promotions, and selection techniques and tests to ensure that they provide equal opportunity and do not have a discriminatory effect, and if the Unit has one or more union agreements, describe how the Unit cooperates with each union to ensure EEO policies are followed for the Unit's union-member employees and job applicants.

Compensation for the staff at GPTC is based on validated salary and grade order for each job within the organization. This guide is in compliance with guidelines from the Georgia Office of Planning and Budget, the Georgia State Department of Audits, and the Georgia Merit System. Each year the organization is required to undergo a comprehensive audit of its financial systems, which includes compensation practices. Guidelines for awarding salary increases, promotions and the selection process are published in the GPTC Policy Manual.

All full-time employees receive paid vacation and sick leave. Each employee accrues a minimum of 15 days vacation per year, and 15 days sick leave per year. Additionally, all full-time employees receive 12 paid holidays per year.

Employee benefits are administered by the Georgia Merit System, State Employees' Retirement System, and the Georgia Department of Community Health. All full-time employees are eligible to participate in the benefits programs which include optional participation for health and other insurance plans. Participation in the retirement program is not optional and all full-time employees have an individual retirement account with the Employees' Retirement System. Additionally, employees are offered optional retirement plans which include tax-sheltered annuities, 457, and 401-K plans. Part-time employees participate in a Defined Contribution retirement plan and are eligible to participate in an optional 401-K plan. Additionally, there are offered health insurance plans through a private vendor.

GPTC does not have a union agreement with any labor organization.

- (i) If you are a religious broadcaster and any of your full-time employees are subject to a religious qualification as described in § 73.2080(a) of our rules, please indicate this in your response to this letter and provide data as applicable to your EEO program.

This section does not apply to GPTC.

4. Time Brokerages.

- (a) Brokered station(s). If the Unit employs fewer than five full-time employees and any station included in it is subject to a time brokerage agreement in addition to responding to this letter to provide us a list of the Unit's full-time employees listed by job title (and number of hours assigned to work) and answer question 3(e) above, you must immediately forward a copy of this letter to the broker under each such agreement.

This section does not apply to GPTC.

- (b) Brokers. If you are the broker of any Unit station referenced above, you are required to supply the Commission with the information requested herein regarding your full-time employees who work at each such brokered station. If this letter is addressed to you requesting data about a station licensed to you, and you also broker a station in another employment unit, you must send us the information requested herein for each of your stations and your full-time employees at each brokered employment unit, if the recruitment data for any such brokered unit is included with that for your own station referenced above. See 47 C.F.R. § 73.2080(f) (3). If your employees at your own station(s) combined with your employees at the station(s) you are brokering total fewer than five full-time employees, however, you need not provide such information. Instead, you must respond to this letter by the deadline described below by providing us with a list of your station unit's full-time employees (listed by job title and number of hours regularly assigned to work per week) and the same type of list for the full-time employees you employ at the brokered station(s), and a response to question 3(e).

This section does not apply to GPTC.